

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: GREGORY ALAN KROUSE
CHRISTINA L. KROUSE**

CHAPTER 13

DEBTOR(S)

CASE NO. 1:20-bk-03459

**GREGORY ALAN KROUSE
CHRISTINA L. KROUSE**

MOVANT(S)

VS.

**DISCOVER BANK DISCOVER PRODUCTS INC
RESPONDENT**

**OBJECTION TO PROOF OF CLAIM #1 FILED BY DISCOVER BANK DISCOVER
PRODUCTS INC**

NOW COMES the above-named Debtors, by and through their attorney of record, pursuant to 11 U.S.C. Section 502(b) and Bankruptcy Rule 3002, and respectfully object to the proof of claim #1 filed Discover Bank Discover Products Inc on December 17, 2020 for the following reasons:

1. On December 4, 2020 Debtors filed this Chapter 13 Case.
2. On December 17, 2020, Discover Bank Discover Products Inc filed proof of claim #1 in Debtors' case in the amount of \$11,171.44.
3. Debtors assert that the supporting information attached to Discover Bank Discover Products Inc's proof of claim shows a "Last Payment Date" of February 17, 2015 and a "Charge Off Date" of June 30, 2014.
4. Debtors assert they have not made payments after the "Last Payment Date" and this debt does not appear on their respective credit reports.
5. Debtors therefore assert that Discover Bank Discover Products Inc abandoned collection of this claim as of the "Charge Off Date" of June 30, 2014.
6. Debtors assert that pursuant to 11 U.S.C. § 502(b)(1), applicable Pennsylvania law governs the collectability of this debt.
7. Debtors assert that this debt is time-barred and uncollectable pursuant to 42 Pa.C.S. § 5525(a).
8. Debtors assert Discover Bank Discover Products Inc's unsecured claim filed with proof of claim #1 should be disallowed in its entirety.

WHEREFORE, the Debtor respectfully requests the Court issue an order disallowing Claim #1 filed by Discover Bank Discover Products Inc in its entirety.

Dated: March 15, 2021

Respectfully Submitted,

/s/ Nicholas G. Platt

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